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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In re Applications of)
)
)
AMERITECH CORP.,)
Transferor,)
)
AND)
)
SBC COMMUNICATIONS INC.,)
Transferee,)
)
For Consent to Transfer Control of)
Corporations Holding Commission)
Licenses and Lines Pursuant to)
Sections 214 and 310(d) of the)
Communications Act and Parts 5,)
22, 24, 25, 63, 90, 95 and 101)
of the Commission's Rules)
)

CC Docket No. 98-141
ASD File No. 99-49

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF SPRINT CORPORATION

Pursuant to the Common Carrier Bureau's February 18, 2000 Public Notice (DA 00-335), Sprint Corporation, on behalf of its operating subsidiaries, hereby files its Comments on SBC's February 15, 2000 letter seeking interpretation of the merger conditions imposed in the Memorandum Opinion and Order herein,¹ or other relief appropriate under the terms of the Merger Order, so as to allow the SBC ILECs (rather than the advanced services affiliates SBC is forming pursuant to that order) to own combination plugs/cards and optical concentration devices. Attached to SBC's letter is a working draft of interconnection agreement language that presumably is being furnished to the Commission to illustrate how SBC might propose to incorporate these devices into its offering of unbundled network elements to CLECs.

¹ 14 FCC Rcd 14712 (1999) ("Merger Order").

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Sprint does not oppose SBC ILEC ownership of either the combination plugs/cards or optical concentration devices. However, Sprint has serious concerns that SBC may be embarking on a strategy that is intended either to limit CLECs to the particular advanced services technology that SBC has chosen for its advanced services affiliates or to make CLEC use of alternative technologies difficult or prohibitively expensive. Several provisions in the working draft interconnection agreement language appended to SBC's letter² heighten Sprint's concerns in this regard. Thus, if the Commission decides to grant the narrow relief sought by SBC (*i.e.*, ILEC ownership of combination plugs/cards and optical concentration devices), the Commission should in no way endorse the particular approach to advanced services SBC describes in its letter, nor should the Commission either explicitly or implicitly endorse the working draft interconnection agreement language appended by SBC, without giving all interested parties a full opportunity to address their concerns with these broader issues. For the time being, Sprint is willing to pursue its concerns through the negotiations/arbitration process and through appropriate actions before state regulatory commissions, but reserves the right to air these issues before the Commission at a later time should circumstances so warrant.

Respectfully submitted,

SPRINT CORPORATION



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March 3, 2000

² Although Sprint has been negotiating advanced services interconnection with SBC for some time now, SBC had never furnished Sprint with the proposed interconnection terms attached to its February 15 letter.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document of Sprint Corporation was sent by Hand Delivery or United States First-Class mail, postage prepaid, this 3rd day of March, 2000 to the following parties:


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